

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**LEAGUE OF WOMEN VOTERS OF  
OHIO, A. PHILIP RANDOLPH  
INSTITUTE OF OHIO, GEORGE W.  
MANGENI, and CAROLYN E.  
CAMPBELL,**

**Plaintiffs,**

**v.**

**FRANK LAROSE, in his official capacity  
as Secretary of State of Ohio,**

**Defendant.**

CASE NO. 20-cv-3843-MHW-KAJ

JUDGE MICHAEL WATSON

MAGISTRATE JUDGE KIMBERLY  
JOLSON

**PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE LIMITATION**

Plaintiffs League of Women Voters of Ohio, A. Philip Randolph Institute of Ohio, George W. Mangeni, and Carolyn E. Campbell (collectively "Plaintiffs") hereby move the Court for leave to exceed the page limitations set forth in Local Rule 7.2(a)(3) and in this Court's Standing Orders. As soon as possible, Plaintiffs intend to file a motion for a preliminary injunction, enjoining Defendant LaRose from enforcing Ohio's signature-matching processes on absentee ballot applications and absentee ballots, to the extent those processes are unconstitutional. Plaintiffs anticipate that their memorandum in support of their forthcoming motion for a preliminary injunction will exceed the 20-page limitation established by this Court. Defense counsel have represented that they do not oppose Plaintiffs' motion to exceed the page limitation.

Extraordinary circumstances warrant granting this motion. A movant for a preliminary injunction must demonstrate why they have “a strong likelihood of success on the merits.” *Blue Cross & Blue Shield Mut. of Ohio v. Blue Cross & Blue Shield Ass’n*, 110 F.3d 318, 322 (6th Cir. 1997). Because Plaintiffs have brought three separate claims in this action—each with a distinct legal analysis—it is not possible to explain to the Court why Plaintiffs have a strong likelihood of success on the merits of each claim in the prescribed page limit. In addition, the factual background of the motion for a preliminary injunction, while not complicated, will necessarily be lengthy. Plaintiffs must include a detailed description of the processes set forth in Ohio law—as well as the significant practical differences in enforcement between Ohio’s 88 county boards of elections—with respect to signature matching on both absentee ballot applications *and* cast absentee ballots.

Plaintiffs have made substantial efforts to limit the length of their preliminary injunction papers. However, given the number of claims that must be addressed and the amount of detail necessary to describe the signature-matching system in place in Ohio’s 88 counties, additional pages beyond this Court’s 20-page limit are required for Defendants to fully present their arguments for why a preliminary injunction is necessary. While Plaintiffs are still finalizing their motion for a preliminary injunction, Plaintiffs estimate that the memorandum in support will not exceed 45 pages.

For these reasons, Plaintiffs request that this Court grant leave to exceed the page limit set forth in the Local Rules and this Court’s Standing Orders.

A proposed Order is attached hereto.

DATED: August 13, 2020

Respectfully submitted,

/s/ Freda J. Levenson

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2020, I filed a copy of the foregoing Motion for Leave to Exceed Page Limitation using the Court's Electronic Filing System, and that counsel for all parties received electronic notice through that system.

/s/ Freda J. Levenson  
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